

Statement of Frank J. Minniti, Jr.

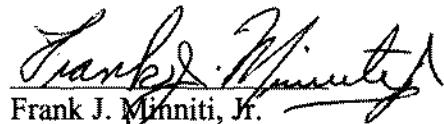
1. I am Frank Minniti and I was a manager at Up-To-Date Laundry, Inc., located in Baltimore, from late August 1999 until late November 1999. I voluntarily left work at Up-To-Date right after Thanksgiving.
2. In August 1999, I learned from a colleague in the laundry business that Brad Minetree was looking to hire a supervisor. I talked to Brad after that and he offered me a job that same day. The following week on Monday, I went to work for Up-To-Date. I was hired by Brad Minetree and I worked closely with him as his assistant and as Operations Manager.
3. I started working in the commercial laundry business in about 1975 and I have worked in that business since that time as a manager. I worked for Total Line Care from about 1984 to 1998 as a Vice President of Plant Operations and as a part owner. Just before joining Up-To-Date Laundry I worked for Tartan Linen Services in New York as a plant manager in an operation that was washing about 80,000-100,000 lbs. of laundry per day. I also have managed other commercial laundry operations during my professional career.
4. At Up-To-Date, my duties were broad and included giving Brad advice, including about issues such as plant operations and pricing. I also worked closely with another plant manager, John Fitzgerald. I had a desk that was on the plant floor and I spent a lot of time on the plant floor and, I generally worked long hours. I met with Brad Minetree and Nancy Stair on a day-to-day basis and they were both very involved in plant operations.
5. The employees who worked at Up-To-Date could be trained on the job and the flat work and soil room jobs did not require any special skills and workers could quickly learn these tasks. Employees who worked on the tunnel and dryers could be trained on the job in a matter of days.
6. The soil room work is an especially brutal and disgusting job because employees are required to handle soiled laundry. One time at Up-To-Date a black employee working in the soil room discovered half of an arm in the laundry. Soil room employees also have found other body parts, such as fingers, at Up-To-Date. Employees need special protective gear and there are serious safety and health concerns that the company must address for this type of work. It should be the best paying job in the plant and, in my experience, a lot of laundries pay soil room workers more money for that task.
7. Soon after I started, I became aware that Hispanics making more money than blacks who were doing the same types of jobs. A long-time employee who worked in the wash room, who I believe was William White, approached me and raised a concern

that he and other blacks were underpaid in comparison to Hispanic employees who did the same job as him and who were not as experienced.

8. I talked to Mike Ashley about this pay issue and I also heard Mike Ashley tell Brad that blacks were not being paid the same as Hispanics for doing the same job in the soil room. Brad brushed him off and did not give him a serious response.
9. I spoke about this pay issue with John Fitzgerald and he said that the complaint was true. I asked Brad Minetree and Nancy Stair about the difference in wages between blacks and Hispanics. Brad also told me that Hispanics were making more money than blacks. He said that Hispanics were better workers than black workers and they come to work every day. My impression was that there were some good black workers there.
10. Based on my experience, I can tell you that you should not pay Hispanics more than the blacks if they are doing the same job. I warned Brad about the pay inequity between black and Hispanic employees. Brad said that: "I am not going to worry about it." I also talked about this unequal pay issue with Nancy Stair and she told me that Hispanics were better workers, were more dependable and blacks were not worth it. She said that we will pay employees what we want to pay them.
11. No one at Up-To-Date, including Brad, Nancy or John, ever said that the reason that Hispanics employees were paid more than blacks was because of the distance they travelled to work or because of their qualifications.
12. I also heard Nancy Stair and Brad Minetree state several times that blacks were lazy and looking for handouts.
13. Based on my observations I believed that Brad had sexual relationships with laundry employees. It was my observation that Nancy Stair was having a personal relationship with an employee who worked in the washroom, Frederico Yanez-Alva and he would not take any direction from me and I told that to Brad. John Fitzgerald also said that he was one of her favorites.
14. Up-To-Date did not have any training about discrimination or harassment issues and I never saw any company handbook on these topics. I have had training on these issues in my past jobs in the laundry business.
15. Maria "Lulu" Espinosa was a supervisor at the company who worked under me. About six or seven weeks after I started, she told me that she had been asked to translate Brad's repeated requests for sexual favors to company employees. She also told me that she was intimidated and afraid that if she did not do this for him that he would fire her.

16. I also had contact with David Minetree. I was led to believe by David and also by Brad that he was the service manager and was in charge of the drivers. David had no control over his emotions and he continually was cursing on the plant floor. He had severe problems controlling his anger. I saw him kick chairs and throw things. He would get very angry and yell. I also heard David refer to black employees as "niggers" and "fucking niggers" on the plant floor. Employees heard these outbursts. I was shocked by this type of behavior and I objected to David about his use of foul and abusive language. I also talked to Nancy and Brad about David's outbursts. They brushed off my concerns by telling that he has always been like that.
17. I also heard David make embarrassing and inappropriate comments about a black female employee who worked on the scales. He told me, within her hearing, that if you gave her \$20 she would give you a blow job.
18. Before I left, I also heard that complaints of discrimination had been filed against the company. I spoke to Brad about these complaints and he told me that his philosophy was to stall and delay rather address these issues. I also asked Brad Minetree about the sexual harassment claims and he told me that they were from disgruntled employees and involved the union organizing drive.

I swear under penalty of perjury that this statement is true and correct to the best of my knowledge and ability.



Frank J. Minniti, Jr.

1-30-03
Date